

FILED
Clerk
District Court

SEP 25 2006

For The Northern Mariana Islands
By _____
(Deputy Clerk)

VICENTE T. SALAS
Law Office of Vicente T. Salas
2nd Floor, UIU Building, Chalan Monsignor Guerrero
San Jose Village
P.O. Box 501309
Saipan, MP 96950
Telephone No.: (670) 234-7455/234-7427
Facsimile No.: (670) 234-7256

F. MATTHEW SMITH
Law Office of F. Matthew Smith, LLC
2nd Floor, UIU Building, Chalan Monsignor Guerrero
San Jose Village
P.O. Box 501127
Saipan, MP 96950
Telephone No.: (670) 234-7455/234-7427
Facsimile No.: (670) 234-7256

Attorney for Defendant NMC.

**IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS**

JOHN (JACK) ANGELLO,]	Civil Action No. 03-0014
]	
Plaintiff,]	
]	
vs.]	NOTICE OF STIPULATION
]	and PROPOSED ORDER
]	
NORTHERN MARIANAS COLLEGE,]	
]	
Defendant.]	
_____]	

Defendant Northern Marianas College ("NMC") hereby gives notice as follows:

1. Trial preparations in this matter are governed by this Court's Order Setting Trial and Other Dates (filed April 20, 2006), including an order that the parties submit stipulated statements and exhibits before 3:30 pm on Friday, September 22, 2006. In addition, the aforementioned order requires the parties to met and confer and present any remaining disputes on or before Tuesday, September 26, 2006, at 3:30 pm.

2. Danilo T. Aguilar, Attorney for Plaintiff Jack Angello, is currently off-island in the Philippines and the parties have been unable to effectively discuss the statements and submissions required to be submitted by Friday, September 22, 2006; although both parties have tried to discuss such matters by phone. Further, his absence, makes it impossible for a stipulation to be signed and submitted prior to the current deadline.

3. The undersigned attorney wishes to give notice to this Court, as well as request a short extension - as discussed by phone with Mr. Aguilar, attorney for Plaintiff - that would enable the parties to submit to the Court all ordered stipulated statements regarding the filed exhibits, material facts and elements on Tuesday, September 26, 2006, by 3:30 pm, instead of today (Friday, September 22, 2006), together with any remaining disputes and other unresolved matters that area already ordered to be brought to the Court's attention at that time.

4. Such an extension would provide the parties time to meet and confer after Mr. Aguilar returns from off-island this coming weekend. This notice is supported by the attached declaration of counsel.

Respectfully submitted, noticed and requested this 22nd day of September, 2006.

/s/

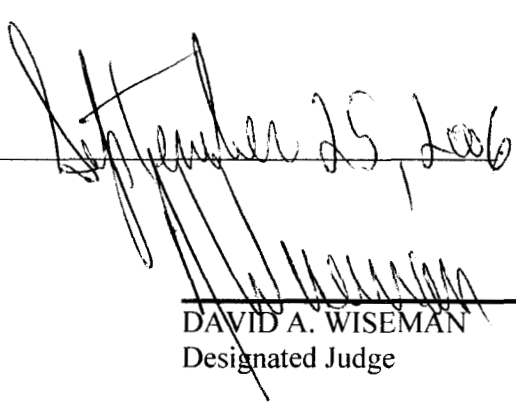
F. MATTHEW SMITH
Attorney for Defendant NMC

ORDER

For good cause, it is hereby ORDERED:

That the time to submit matters set forth in paragraph 4 of this Court's Order Setting Trial and Other Dates (filed April 20, 2006), is hereby extended to Tuesday, September 26, 2006, at 3:30 p.m.

SO ORDERED



DAVID A. WISEMAN
Designated Judge